

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Jane Doe 1, individually and on behalf of  
all others similarly situated,

Plaintiff,

v.

JPMorgan Chase Bank, N.A.,

Defendant.

Case No. 1:22-CV-10019 (JSR)

**AMENDED DECLARATION OF BRADLEY J. EDWARDS IN SUPPORT OF  
MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES**

I, Bradley J. Edwards, declare as follows:

1. I am a member in good standing of the bar of the State of New York and am admitted to practice before this Court. I am a Partner at Edwards Henderson Lehrman PLLC (“EHL” or “the Firm”). I make this declaration on my own personal knowledge, and if called as a witness to testify, I could and would testify competently to the following facts.

2. I am submitting this declaration in support of my Firm’s application for an award of attorneys’ fees, expenses, and charges (“expenses”) in connection with services rendered in the above-entitled action (the “Litigation”).

3. EHL is Co-Lead Counsel of record for the Class certified for settlement purposes and Class Representative Jane Doe 1 (“Class Representative”).

4. The information in this declaration regarding EHL’s time and expenses is taken from time and expense reports and supporting documentation prepared and maintained by the Firm in the ordinary course of business. I am the partner who oversaw and conducted the day-to-day

activities in the Litigation and I reviewed these reports (and backup documentation where necessary or appropriate) in connection with the preparation of this declaration. The purpose of this review was to confirm both the accuracy of the entries on the printouts as well as the necessity for, and reasonableness of, the time and expenses committed to the Litigation. Based on this review, I believe that the time reflected in the Firm's lodestar calculation and the expenses for which payment is sought herein are reasonable and were necessary for the effective and efficient prosecution and resolution of the Litigation.

5. The number of hours spent on the Litigation by the Firm is 7,626. The lodestar amount for attorney/paraprofessional time based on the Firm's 2023 rates is \$6,803,895.00. A breakdown of the lodestar is provided below:

<b>Name</b>	<b>Position</b>	<b>Hours</b>	<b>Rate</b>	<b>Lodestar</b>
Bradley Edwards	Partner	2038.90	\$1,250.00	\$2,548,625.00
Brittany Henderson	Partner	1669.50	\$1,100.00	\$1,836,450.00
Catherine Davis	Associate	702.80	\$750.00	\$527,100.00
Dean Kaire	Associate	1587.00	\$650.00	\$1,031,550.00
Diane Cuddihy	Associate	880.00	\$850.00	\$748,000.00
Maria Kelljchian	Paralegal	747.80	\$150.00	\$112,170.00

6. The hourly rates shown above are the Firm's regular 2023 rates. These hourly rates are consistent with the hourly rates the Firm bills to clients when litigating in state and federal courts during 2023. The Firm's rates are set based on periodic analysis of rates charged by firms performing comparable work on both the plaintiff side and defense side.

7. The Firm seeks an award of \$537,677.43, in expenses in connection with the prosecution of the Litigation. These are expenses that EHL paid out of pocket, and are in addition

to expenses paid out of pocket by Boies Schiller Flexner LLP. The categories and amounts of those expenses are:

<b>Firm Expenses and Charges</b>	
<b>Expense Category</b>	<b>Amount</b>
Transportation, Travel, and Meals	\$65,223.70
Messenger/Delivery Services	\$838.11
Telephone/Teleconference	\$116.68
Computer Research	\$455.57
Court Costs	\$1,442.10
Transcript Expenses	\$30,963.15
Document Reproduction	\$19,821.55
Third-Party Productions	\$16,538.24
Consultants/Experts	\$310,373.75
Mediation Fees	\$75,216.78
Claims Administration	\$16,687.80
<b>Total</b>	<b>\$537,677.43</b>

8. The expenses for which the Firm seeks compensation are:
- a. **Transportation, Travel, and Meals:** \$65,223.70. In connection with the prosecution of this case, the Firm has paid for travel and related expenses to, among other things, attend court hearings, meet with witnesses, mediators and opposing counsel, and take or defend depositions.
  - b. **Messenger/Delivery Services:** \$838.11. The Firm utilized overnight couriers and other messenger services (where necessary) to transmit hard-copy versions of various documents to attorneys, experts, and the Court.
  - c. **Telephone/Teleconference:** \$116.68. These charges relate to the extensive and repeated teleconferences Class Counsel held among its attorneys, co-counsel, and opposing counsel concerning various aspects of the Litigation.

- d. **Computer Research**: \$455.57. This category includes vendors such as LexisNexis and Westlaw. These resources were primarily used to obtain access to legal research. This expense represents the actual charges paid by EHL for use of these services in connection with this Litigation.
- e. **Court Costs**: \$1,442.10. These expenses were paid to the Court for filing fees and to firms or individuals who served subpoenas.
- f. **Transcript Expenses**: \$30,963.15. EHL paid vendors for the transcription of various depositions.
- g. **Document Reproduction**: \$19,821.55. EHL paid vendors for various bulk scanning and printing tasks.
- h. **Third-Party Productions**: \$16,538.24. EHL reimbursed the Estate of Jeffrey E. Epstein for costs incurred in producing documents pursuant to a third-party subpoena.
- i. **Experts/Consultants**: \$310,373.75. EHL paid fees to the following experts and consultants retained by Class Counsel for the Litigation:
  - i. Ross Delston—Mr. Delston is a Certified Anti-Money Laundering Specialist who provides expert testimony and consulting on Bank Secrecy Act and Anti-Money Laundering compliance issues. Mr. Delston provided consultant services in this matter.
  - ii. Jonathan Rusch—Mr. Rusch is an Anti-Money Laundering and Corruption Expert specializing in Global Risk and Compliance. He is a former federal prosecutor, regulator, and anti-bribery and corruption compliance head at a global financial institution. He performed

significant analysis of all financial data produced by Defendant and prepared an extensive expert report regarding the actions and inactions of Defendant with respect to Jeffrey Epstein.

iii. Jorge Amador—Mr. Amador is a Lawyer and a Certified Public Accountant, and Certified in Financial Forensics with over 25 years of corporate and public accounting experience, including disputes, litigation, forensic investigations, discovery and regulatory compliance. He performed forensic accounting services with respect to review and analysis of Defendant's documents.

iv. Prism Investigations—Prism is a litigation consultancy firm that performed deposition strategy consultation, document review, and research support.

j. **Mediation Fees:** \$75,216.78. Class Counsel and Defendants' Counsel split fees owed to Layn Phillips of Phillips ADR, who was instrumental in brokering the Settlement.

k. **Claims Administration:** \$16,687.80. Specifically, EHL covered costs to advertising agencies to help facilitate notice to Class Members.

9. The expenses pertaining to this case are reflected in the books and records of EHL. These books and records are prepared from receipts, expense vouchers, check records, and other documents and are an accurate record of the expenses.

I declare under penalty of perjury that the foregoing is true and correct. Executed November 7, 2023, at New York, New York.

/s/ Bradley J. Edwards  
Bradley J. Edwards